

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY HITE and
BRIDGET BUREAU,

INDICTMENT

Defendants.

_____/

The Grand Jury charges:

At times relevant to this Indictment:

1. Defendant GREGORY HITE was a resident of Michigan, residing in Norton Shores, Hudsonville, and Lake, Michigan. Norton Shores and Hudsonville are within the Southern Division of the Western District of Michigan.

2. Defendant BRIDGET BUREAU was a resident of Michigan, residing in Norton Shores, Hudsonville, and Lake, Michigan.

3. Defendant GREGORY HITE operated a series of businesses in the Western District of Michigan involving retail recreational vehicle and trailer sales, manufacture, and repair, which his wife, defendant BRIDGET BUREAU, helped him operate. Among these were:

- a. Great Lakes Recreational LLC, d/b/a Hites Rental doing business in Coopersville;

- b. Great Lakes Rec LLC, d/b/a Great Lakes Recreational, doing business in Coopersville and Dorr, Michigan;
- c. [L.M.] d/b/a Alpine Trailer Sales, doing business in Coopersville, Michigan;
- d. Great Lakes of West Michigan, LLC, d/b/a as Great Lakes Recreational, doing business in Dorr, Michigan;
- e. Great Lakes Trailer Manufacturing LLC, d/b/a Great Lakes Trailers, doing business in Dorr and Byron Center, Michigan;
- f. GL Trailers LLC, doing business in Byron Center, Michigan; and
- g. GLR Transport LLC, d/b/a GLREC and GL Transport, doing business in Coopersville, Michigan.
- h. Great Lakes Recreational Brokerage LLC, d/b/a GL Brokerage, doing business in Coopersville, Michigan.

4. The following businesses were in the business of lending money to small business retailers and manufacturers, and made loans to the defendants' various businesses:

- a. Ascentium Capital, doing business in Kingwood, Texas;
- b. EBF Partners, LLC, doing business in Miami, Florida;
- c. Beacon Funding Corporation, doing business in Northbrook, Illinois;

- d. Platte Valley Bank (FDIC), headquartered in Scottsbluff, Nebraska, d/b/a C.H. Brown Co., LLC, the latter entity doing business in Wheatland, Wyoming;
- e. First Bank of Richmond, N.A. (FDIC), d/b/a First Federal Leasing, doing business in Richmond, Indiana;
- f. North Mill Equipment Finance, LLC, doing business in Norwalk, Connecticut;
- g. Santander Consumer USA, d/b/a Chrysler Capital, doing business in Dallas, Texas;
- h. TCF Equipment Finance, doing business in Minnetonka, Minnesota; and
- i. TCF Bank (FDIC), d/b/a TCF Inventory Finance, Inc., doing business in Schaumburg, Illinois (collectively, the “Lenders”).

COUNT 1
(Conspiracy to Commit Wire Fraud)

5. From in or about 2016 and continuing up to and including June 2020, in the Southern Division of the Western District of Michigan, and elsewhere, the defendants,

GREGORY HITE and
BRIDGET BUREAU,

knowingly combined, conspired, confederated, and agreed with each other to commit the offense of wire fraud.

Overview of Conspiracy

6. From 2016 and continuing to at least June 2020, GREGORY HITE, and BRIDGET BUREAU (collectively “defendants”) engaged in a scheme and artifice to defraud and to obtain money and property from the Lenders by means of false and fraudulent pretenses, representations, and promises, by electronically submitting, or causing to be submitted, falsified and fraudulent loan documents in the names of third parties whose identities they had stolen.

Object of the Conspiracy

7. The object of the conspiracy was for the defendants to unjustly enrich themselves by submitting false and fraudulent loan documents to the Lenders to gain access to loans using the credit of the identity theft victims to obtain loans.

Manner and Means

8. Among the manner and means by which the defendants carried out the conspiracy were the following:

9. Following the attempted bankruptcy of HITE while running a previous recreational vehicle business in Colorado, defendants moved to the Western District of Michigan and opened and incorporated a series of businesses selling, building, and servicing recreational vehicles and trailers, first in Coopersville, then in Dorr and Byron Center, Michigan.

10. Because of their poor credit history, defendants could not obtain business, property, or inventory loans to operate their new businesses. In order to obtain funds and conceal their own involvement, defendants stole the personal

identifying information (PII). Defendants stole PII including the social security numbers and driver's license images, of several of their family members, D.H., P.H., and C.C., as well as an employee, L.M., and used that PII in numerous loan applications and documents to the Lenders. In the documents, defendants falsely representing those individuals as co-owners or guarantors for the loans when they had not consented to be. Defendants electronically submitted the fraudulent loan documents using the Internet from Michigan to the Lenders who were located in other states, including, but not limited to, Texas, Florida, Illinois, Nebraska, and Connecticut, providing information they knew to be false that was material, including, but not limited to:

- a. false statements respecting the ownership of the businesses;
- b. false statements concerning the presence of individuals as co-guarantors of the loans, without permission;
- c. false statements about the identity of the applicants; and
- d. false representations about the identification information for the basis of the creditworthiness of the applications.

11. In furtherance of the scheme, defendants fielded follow-up due diligence phone calls from the Lenders, meant for D.H., P.H., C.C., or L.M., based on the false information that the identity theft victims were engaged in the fraudulent loan applications. Defendants provided Lenders their own addresses and cellular phone and business phone numbers as contact points for D.H., P.H., C.C., or L.M., so that calls would be directed to them, and the victims would remain unaware of the loans.

When the Lenders called and asked for the male identity theft victims, HITE intercepted the calls and falsely represented himself to be the intended recipient, answering the questions and deflecting detection of the fraud. When the Lenders called and asked for the female identity theft victims, BUREAU intercepted the calls and falsely represented herself to be the intended recipient, answering the questions and deflecting detection of the fraud. HITE and BUREAU instructed their employees to redirect any calls to their businesses in which the caller requested D.H., P.H., or C.C., to HITE or BUREAU as necessary.

12. As a result of defendants' false documents, the Lenders dispersed funds through interstate wire transfers to defendants' businesses' Western Michigan bank accounts or those of their vendors.

13. Defendants secured at least 55 such fraudulent loans and/or credit advances relying on the stolen identification information of the four victims and resulting in losses to the Lenders of over \$2.5 million.

14. It was further part of the conspiracy that the defendants frequently relocated, or simply renamed, their operations to avoid detection by the Lenders. In 2016, defendants opened Great Lakes Recreational LLC in Coopersville, Michigan. Then, in 2017, defendants opened Great Lakes Rec LLC in Coopersville, Michigan, at the same location. In 2018, defendants formed a new entity called Great Lakes of West Michigan LLC and opened a new location in Dorr, Michigan, while still operating Great Lakes Rec LLC, in Coopersville, which also did business under the former name of Great Lakes Recreational. By the end of 2018, defendants were forced

to close their Coopersville location because their collateral was repossessed by a Lender, but defendants continued to use the Great Lakes Rec name, although the entity was physically shut down. By September of 2019, defendants' business in Dorr was effectively shut down because of numerous Lender repossessions and defendants' inability to secure additional inventory. In September 2019, defendants shifted operations to manufacturing trailers and moved to Byron Center, Michigan, incorporating two new businesses into their fraudulent loan scheme, Great Lakes Trailer Manufacturing LLC, and GL Trailers.

Fraudulent Loan Applications in Names of Identity Theft Victims

15. Defendants used the names and PII of third parties to electronically file false and fraudulent loan applications from their computers in Michigan with the Lenders in other states. Defendants assumed the identities of third parties, purported to be those third parties, and provided materially false information on the electronic documents concerning the third parties' credit interest, including false statements about the third parties' ownership of the debtor businesses or guarantee of the applied-for loan.

16. Beginning in 2016 and continuing until at least June 2020, on or about the dates listed below, defendants electronically transmitted, or caused to be submitted, the following loan applications, using the identities of the following third parties, without their consent, for the benefit of the listed business, to the Lenders in the states listed below for the following wired amounts:

Date	Third Party	Business	Lender	Location	Amount
6/18/2018	L.M.	Alpine Trailer Sales	EBF Partners, LLC	Florida	\$73,260.00
7/18/2018	C.C.	Great Lakes Rec, LLC	Ascentium Capital	Texas	\$106,056.00
8/14/2018	D.H.	Great Lakes Rec, LLC	EBF Partners	Florida	\$85,260.00
10/22/2018	C.C.	GLR Transport LLC	Beacon Funding Corporation (later reassigned to TCF Equipment Finance)	Illinois	\$125,610.00
10/22/2018	D.H.	GLR Transport LLC	Platte Valley Bank	Nebraska	\$84,450.00
12/12/2018	D.H.	GLR Transport LLC	Platte Valley Bank	Nebraska	\$53,000.00
12/14/2018	D.H. and P.H.	GLR Transport LLC	Beacon Funding Corporation	Illinois	\$74,754.70
12/21/2018	D.H. and P.H.	GLR Transport LLC	Beacon Funding Corporation	Illinois	\$38,699.70
12/27/2018	D.H.	Great Lakes Rec LLC	EBF Partners, LLC	Florida	\$31,913.31
2/06/2019	C.C.	GLR Transport LLC	North Mill Equipment Finance, LLC	Connecticut	\$70,784.71
2/27/2019	D.H. and P.H.	Great Lakes Rec LLC	First Bank of Richmond, N.A. (FDIC), d/b/a First Federal Leasing	Indiana	\$21,671.49
3/05/2020	P.H.	Great Lakes Trailer Manufacturing LLC	EBF Partners	Florida	\$64,260.00

17. After the above-listed loans were approved and disbursed by the Lenders, based on the fraudulent applications based on the identity-theft victim's PII, defendants HITE and BUREAU used the funds to maintain and operate their businesses and lifestyle in Michigan. When defendants did not make payments on the loans as required, the Lenders called to inquire of the named identity-theft victim listed as the owner/guarantor. Again, defendants redirected and intercepted the Lender calls, impersonating the identity theft victims—HITE for the males and BUREAU for the females—to avoid detection of their fraud. Oftentimes, when Lenders sent their agents to collect collateral equipment when the loans went unpaid, HITE hid or sold the equipment and avoided the agents.

18. It was further part of the scheme that defendants would utilize the same equipment already encumbered by a different Lender as collateral for multiple

fraudulent loans, utilizing different company names as the borrower and vendor, while using separate individual identity theft victim's PII to secure the separate loans. For example, on November 19, 2018, using the PII of C.C., defendants secured a loan for Great Lakes of West Michigan LLC in the amount of \$49,446.80 with the Kubota Credit Corporation for the purchase of a 2018 Kubota Mini-Excavator, Model KX033-4R3, with serial number 12244. Less than a month later, on December 12, 2018, defendants used the same Mini-Excavator to secure another loan for Great Lakes Rec LLC, using the PII of D.H., with C.H. Brown Co., in the amount of \$54,030.00. In the latter transaction, defendants failed to disclose that they were also the vendor, GL Transport/GL Brokerage, in the transaction, making it appear that this was an arms-length transaction.

19. The identity-theft victims discovered defendants' fraud when the Lenders began collections actions against them, filing civil suits and liens against their real property.

18 U.S.C. § 1349

18 U.S.C. § 1343

COUNT 2
(Conspiracy to Commit Mail Fraud)

20. Paragraphs 1 through 19 of this Indictment are realleged and incorporated by reference in this Count, as if fully set forth herein.

21. Beginning in or about 2016, and continuing to in or about June 2020, in the Western District of Michigan, Southern Division, and elsewhere, the defendants,

GREGORY HITE and
BRIDGET BUREAU,

knowingly combined, conspired, confederated, and agreed with each other to commit the offense of mail fraud.

Mailings Supporting Defendants' Fraud

22. Defendants caused the following mailings of supporting documents in furtherance of their ongoing fraudulent scheme on or about the following dates to the listed Lenders utilizing the PII of unknowing third parties in pursuit of the listed loan amounts concerning the following items:

Date	Carrier	From	To	Item	Lender	Third Party	Business	Amount
6/15/2018	Fed Ex Express	Muskegon, Michigan	Miami, Florida	Confession of Judgment	EBF Partners	L.M.	Alpine Trailer Sales	\$104,250
7/13/2018	UPS	Muskegon, Michigan	Kingwood, Texas	Title Documents	Ascentium Capital	C.C.	Great Lakes of West Michigan LLC	\$225,325.20
12/26/2018	Fed Ex Express	Muskegon, Michigan	Miami, Florida	Confession of Judgment	EBF Partners	D.H.	Great Lakes Rec LLC	\$75,498.83
3/16/2020	UPS	Big Rapids, Michigan	Wilmington Ohio	Signed lease, financing, and closing paperwork for lease of 2020 Dodge Ram	Santander Consumer USA, d/b/a Chrysler Capital	P.H.	Great Lakes Trailers	\$62,282.28
3/23/2020	UPS	Big Rapids, Michigan	Wilmington Ohio	Signed sales, financing, and closing paperwork for 2019 Dodge Ram	Santander Consumer USA, d/b/a Chrysler Capital	P.H.	Great Lakes Trailers	\$71,595.00

18 U.S.C. § 1349

18 U.S.C. § 1341

COUNTS 3 THROUGH 6
(Aggravated Identity Theft)

23. Paragraphs 1 through 22 of this Indictment are realleged and incorporated by reference in these Counts, as if fully set forth herein.

24. Between on or about the dates identified in Column B, in the Southern Division of the Western District of Michigan, and elsewhere, the defendants,

GREGORY HITE and
BRIDGET BUREAU,

during and in relation to the felony of conspiracy to commit wire fraud charged in Count 1 and the conspiracy to commit mail fraud in Count 2 of this Indictment, which is incorporated as if alleged herein, knowingly transferred, possessed, and used, without lawful authority, the means of identification of other persons, namely, the means of identification described in Column C belonging to the other persons identified in Column D, knowing that those means of identification belonged to other actual persons.

A Count	B Date Range	C Means of ID	D Other Person
3	6/12 – 6/18/2018	name, date of birth, Social Security number	L.M.
4	6/29 – 7/18/2018	name, date of birth, Social Security number	C.C.
5	8/14/2018	name, date of birth, Social Security number	D.H.
6	11/19 – 12/14/2018	name, date of birth, Social Security number	D.H. and P.H.

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 1028A(b)(2)

18 U.S.C. § 1028A(c)(5)

18 U.S.C. § 1028(d)(7)(A)

**FORFEITURE ALLEGATION
(Conspiracy to Commit Wire and Mail Fraud)**

The allegations contained above in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of the violations of 18 U.S.C. §§ 1349, 1343 and 1341 set forth in Counts 1 and 2 of this Indictment, the defendants,

**GREGORY HITE and
BRIDGET BUREAU,**

shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to the violation. The property to be forfeited includes, but is not limited to, the following:

1. MONEY JUDGMENT: A sum of money equal to at least \$5,000,000, which represents the proceeds obtained, directly or indirectly, from the offenses charged in Counts 1 and 2.

2. SUBSTITUTE ASSETS: If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided
without difficulty.

the United States of America shall be entitled to forfeiture of substitute property
pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)

28 U.S.C. § 2461(c)

21 U.S.C. § 853(p)

18 U.S.C. § 1349

18 U.S.C. § 1343

18 U.S.C. § 1341

A TRUE BILL



GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



STEPHEN P. BAKER
Assistant United States Attorney